



Re: 22cv1606 Richtone Design Group, L.L.C. v. Kelly et al

1 message

Charles Knull <chk@knullpc.com>

Tue, Oct 11, 2022 at 2:43 PM

Reply-To: chk@knullpc.com

To: Gordon Troy <gtroy@webtm.com>

Cc: "Lawrence A. Stanley Esq." <lstanley@webtm.com>, Romeo Salta <romeosalta@mac.com>

Dear Gordon

You sent the letter by email on Oct. 5. I have had some medical issues in the meantime, and I will be getting you a response today. But I do not see the hairsplitting about objections and the like as meaning much, in that they basically boil down to "how do we identify photographs by some designation so that the designations are not confusing in later papers" and what documents exactly it is that Plaintiff has objected to which have in any event not been provided, especially since disclosure is ongoing and you delivered a third set of document requests which are being deal with?

Where do you want Sean Gallagher to bring the negatives to examine in Manhattan? And who is the expert who is going to review them? It makes no sense to have them looked at without you an expert look at them.

Meanwhile, we have no privilege logs for the communications of Mary Kelly with the Transparency Project's apparent members, which you claim for some reason are privileged in your responses to our document requests. Where are they?

Thanks.

CK

Charles H. Knull

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On 10/11/2022 9:34 AM, Gordon Troy wrote:

Charles –

I refer to the attached letter (dated October 4) and our tomorrow due date to file with the Magistrate letters regarding any outstanding discovery disputes. The attached letter raises a number of discovery issues and we have yet to receive your reply.

Additionally, we have tried to schedule the date, time & place of inspection of the original materials, and have received no reply.

Kindly advise before close of business today whether and how these matters will be resolved. Otherwise, we will bring them to the attention of the Magistrate.

Gordon

Gordon E. R. Troy | Attorney At Law | Gordon E. R. Troy, PC | *FedEx-UPS-DHL: 183 Highfield Drive, West Windsor VT 05089* | *Postal: PO Box 67, Windsor, VT 05089* | *Direct: 802 881-0647* | *Main: 802 881-0640* | *Mobile/WhatsApp: 802 488-0097*
|e: gtroy@webtm.com | Skype: [gordontroy](https://www.skype.com/user/gordontroy) | This communication may contain information which is confidential, legally privileged and/or protected by attorney-client privilege or under the attorney work product doctrine. Only the intended recipient of this email is authorized to read its contents.

For all trademark matters, please copy tm@webtm.com

----- Forwarded message -----

From: **Lawrence Stanley** <lstanley@webtm.com>
Date: Wed, Oct 5, 2022 at 12:15 PM
Subject: 22cv1606 Richtone Design Group, L.L.C. v. Kelly et al
To: Charles Knull <chk@knullpc.com>

Charles -

Please see the attached letter from Gordon re discovery.

Kind regards,

Lawrence

Lawrence Stanley | Paralegal | Gordon E. R. Troy, PC | FedEx-UPS-DHL: [183 Highfield Drive, West Windsor VT 05089](#) | Postal: PO Box 67, Windsor, VT 05089 | (Main) 802 881-0640 | **(Direct) 802 881-0649** | (Fax) 646 588-1962 | lstanley@webtm.com This communication may contain information which is confidential, legally privileged and/or protected by attorney-client privilege or under the attorney work product doctrine. Only the intended recipient of this email is authorized to read its contents.